

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WHEREFORE, Defendant Yahoo! Inc. respectfully requests that this Court grant its motion and enter the attached proposed order.

Dated: October 14, 2016

GREENBERG TRAURIG LLP

By: /s/ Brian T. Feeney

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YAHOO! INC.

EXHIBIT 1-4

PROPOSED TO BE FILED UNDER SEAL PURSUANT
TO CONFIDENTIALITY PROTECTIVE ORDER (DKT. 31)
AND SUPPLEMENTAL PROTECTIVE ORDER TO GOVERN
THE PRODUCTION/INSPECTION OF SOURCE CODE (DKT. 75)

EXHIBIT 5

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
Jeffrey A. Hansen - 7/18/2016

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALICE LEE, et al.,

Plaintiffs,

VS .

CASE NO.

2:15-cv-02495-

GLOBAL TEL*LINK CORPORATION,

ODW - PLA

Defendant.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF JEFFREY A. HANSEN
San Diego, California
Monday, July 18, 2016
Volume I

Reported by:

MONICA M. CLINE

RPR, CSR No. 8933

Job No. 2347447

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
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1 take because of your service in the Navy; isn't that 09:24:37 AM
2 right? 09:24:42 AM
3 A No. That one I was able to take because I 09:24:42 AM
4 was currently at the Regional Computer Forensics 09:24:46 AM
5 Laboratory at the time. 09:24:50 AM
6 Q All right. Well, we'll get to that. 09:24:51 AM
7 Was there any test given at the end of that 09:24:56 AM
8 course? 09:24:59 AM
9 A There was testing along the way, I know 09:25:04 AM
10 that. 09:25:06 AM
11 Q So there were tests given as part of that 09:25:06 AM
12 course? 09:25:09 AM
13 A Yes. 09:25:09 AM
14 Q All right. And what grade did you get? 09:25:10 AM
15 A I aced them. 09:25:15 AM
16 Q Did you obtain the certification for 09:25:16 AM
17 Encase? 09:25:18 AM
18 A No. 09:25:19 AM
19 Q Why not? 09:25:20 AM
20 A Because it wasn't being offered. 09:25:21 AM
21 Q By who? 09:25:24 AM
22 MR. LESTER: By everybody, I would imagine. 09:25:27 AM
23 Form of the question. 09:25:29 AM
24 MR. GERSHMAN: Is there an objection? 09:25:30 AM
25 MR. LESTER: Yeah, object to the form. 09:25:32 AM

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1	MR. GERSHMAN: That was a speaking	09:25:33 AM
2	objection.	09:25:34 AM
3	MR. LESTER: It's vague. Okay.	09:25:35 AM
4	THE WITNESS: Again, this wasn't the same	09:25:36 AM
5	course that was being -- well, it might have been	09:25:37 AM
6	the same content as what was being offered to the	09:25:40 AM
7	public, but this particular course was not being	09:25:43 AM
8	offered to the public. So it wasn't a certification	09:25:44 AM
9	course for me. In the public world they would have	09:25:48 AM
10	gotten a certification out of it providing it was	09:25:53 AM
11	the same syllabus.	09:25:55 AM
12	BY MR. GERSHMAN:	09:25:59 AM
13	Q So you elected to attend a course where you	09:25:59 AM
14	could -- where you were not eligible for a	09:26:01 AM
15	certification?	09:26:07 AM
16	A I didn't feel that I needed the	09:26:08 AM
17	certification itself. I wanted to know the	09:26:09 AM
18	material.	09:26:13 AM
19	Q You were more interested in the information	09:26:14 AM
20	than the certificate?	09:26:16 AM
21	A Yes.	09:26:18 AM
22	Q But other people out in the public who	09:26:19 AM
23	didn't have access to that nonpublic course, they	09:26:23 AM
24	could obtain theoretically a certification?	09:26:26 AM
25	A I believe that it is the same syllabus as	09:26:29 AM

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1	what they have for the public.	09:26:32 AM
2	Q Did you ever sign up to take the	09:26:36 AM
3	certification test?	09:26:38 AM
4	A No.	09:26:40 AM
5	Q All right. How about Access Data Forensics	09:26:42 AM
6	Toolkit, how long was that course?	09:26:45 AM
7	A That was a few days as well.	09:26:47 AM
8	Q Was there testing?	09:26:48 AM
9	A Yes. The same applies as what was with the	09:26:50 AM
10	Encase.	09:26:54 AM
11	Q Okay. So to use your words, you aced all	09:26:54 AM
12	of the testing?	09:26:57 AM
13	A Yes.	09:26:58 AM
14	Q And did you take any certification tests?	09:26:58 AM
15	A No.	09:27:02 AM
16	Q Certification testing was available;	09:27:03 AM
17	correct?	09:27:07 AM
18	A I know in a civilian world Access Data	09:27:07 AM
19	provides a certification.	09:27:10 AM
20	Q Right.	09:27:12 AM
21	So at this time were you in the Navy?	09:27:13 AM
22	A No.	09:27:18 AM
23	Q So you were a civilian?	09:27:19 AM
24	A Yes.	09:27:20 AM
25	Q Okay. So had you wanted to, you could have	09:27:21 AM

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1 signed up for that certification testing? 09:27:24 AM

2 A If I wanted to pay for it. 09:27:26 AM

3 Q Right. 09:27:27 AM

4 And the same thing for Encase; right? 09:27:28 AM

5 A Yes. 09:27:30 AM

6 Q Okay. You just didn't do it? 09:27:31 AM

7 A Correct. 09:27:32 AM

8 Q So since 2006 there's no other professional 09:27:50 AM

9 education? 09:27:55 AM

10 A No. 09:27:58 AM

11 Q I'm correct? 09:27:59 AM

12 A Correct. 09:28:00 AM

13 Q Are there any -- other than a driver's 09:28:05 AM

14 license, do you have any licenses? I'm using the 09:28:08 AM

15 term licenses as something different from a 09:28:12 AM

16 certification. 09:28:14 AM

17 A In the same context as a driver's license, 09:28:21 AM

18 I'm a licensed amateur radio operator. 09:28:25 AM

19 Q So let me -- that's a fair response. Let 09:28:27 AM

20 me be more specific. 09:28:30 AM

21 Do you have any professional licenses? 09:28:31 AM

22 A No. 09:28:35 AM

23 Q Okay. You have listed several professional 09:28:36 AM

24 certifications, so we can just focus in on those 09:28:41 AM

25 then. 09:28:44 AM

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1 Any of these certifications that you have 09:28:46 AM
2 here on your CV, do they require continuing 09:28:48 AM
3 education? 09:28:51 AM
4 A Yes. 09:28:53 AM
5 Q But you haven't taken any continuing 09:28:54 AM
6 education since 2006? 09:28:57 AM
7 A These certifications were obtained before 09:28:59 AM
8 2006. 09:29:02 AM
9 Q Did they require any continuing education 09:29:03 AM
10 to maintain them, any of them? 09:29:05 AM
11 A Microsoft would encourage people to 09:29:11 AM
12 continue with the certifications, but it's not a 09:29:14 AM
13 requirement. 09:29:18 AM
14 Q Are all of your professional certifications 09:29:29 AM
15 identified here on your CV? 09:29:31 AM
16 A Yes. 09:29:34 AM
17 Q Why don't we just go through these one at a 09:29:45 AM
18 time. 09:29:49 AM
19 Do you remember when you earned the MCP 4.0 09:29:49 AM
20 cert? 09:29:54 AM
21 A I do have those certifications on that CD 09:29:54 AM
22 that I gave you, but I'm going off the top of my 09:29:58 AM
23 head. All of these certifications were obtained 09:30:00 AM
24 between 2000 and 2002. 09:30:03 AM
25 Q Did you take an MCP exam? 09:30:16 AM

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1 customizing and operating personal computers; is 09:35:12 AM
2 that right? 09:35:15 AM
3 A That would be a good description of it. 09:35:16 AM
4 Q And the A+ certification, it only lasts for 09:35:21 AM
5 three years from the date of the exam; isn't that 09:35:23 AM
6 right? 09:35:26 AM
7 A Again, Comp TIA would want people to 09:35:26 AM
8 keep -- you know, to continue to take new 09:35:30 AM
9 certification exams. 09:35:32 AM
10 Q So that's correct, it only lasts for three 09:35:33 AM
11 years? 09:35:37 AM
12 A Yes, I believe. 09:35:38 AM
13 Q To keep it valid you need to earn 20 09:35:40 AM
14 continuing education units over a three-year period 09:35:43 AM
15 and submit it to Comp TIA; correct? 09:35:46 AM
16 A Well, I don't have it in front of me, so -- 09:35:52 AM
17 Q You don't know? 09:35:54 AM
18 A What's that? 09:35:55 AM
19 Q You just don't know? 09:35:55 AM
20 A Yeah, I don't know. 09:35:56 AM
21 Q In any event, you earned that sometime 09:35:58 AM
22 between 2000 and 2002? 09:36:01 AM
23 A That's correct. 09:36:02 AM
24 Q And you did not take the continuing 09:36:04 AM
25 education to keep it current? 09:36:06 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
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1 A I didn't take any other continuing ed on 09:36:10 AM
2 it, no. 09:36:13 AM
3 Q So you did not keep it current? 09:36:14 AM
4 A Again, I'm taking your word on it if there 09:36:16 AM
5 is an expiration on it. 09:36:18 AM
6 Q You don't know if your certification has 09:36:19 AM
7 expired? 09:36:21 AM
8 A That's been 16 years ago. I know in the 09:36:24 AM
9 industry if you have an A+ certification, employers 09:36:27 AM
10 typically don't expect somebody to go retake it, 09:36:30 AM
11 especially if they've been working in the field. 09:36:33 AM
12 Again, those certifications are what would be 09:36:35 AM
13 expected to get a job in the industry. If somebody 09:36:37 AM
14 has been working in the field, it is pretty much a 09:36:41 AM
15 waste of time to go back and keep up on their 09:36:45 AM
16 certifications, because they're already in the 09:36:48 AM
17 industry. 09:36:50 AM
18 Q So you don't know if it is expired? 09:36:51 AM
19 A I don't know if it is. 09:36:53 AM
20 Q Next in the list it says Network+, that's 09:36:59 AM
21 also from Comp TIA; right? 09:37:02 AM
22 A Yes. 09:37:04 AM
23 Q It is an entry level certification for 09:37:05 AM
24 network technicians; correct? 09:37:08 AM
25 A That would be fair, yes. 09:37:12 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
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1 Q You need nine months networking experience 09:37:15 AM
2 before sitting for the exam? 09:37:17 AM
3 A Yes. It represents somebody with at least 09:37:21 AM
4 nine months of experience. 09:37:24 AM
5 Q Like the A+, you need to take continuing 09:37:35 AM
6 education to renew it after three years; right? 09:37:37 AM
7 A I'm not sure on that one. 09:37:41 AM
8 Q So sitting here you don't know if that's 09:37:43 AM
9 expired? 09:37:45 AM
10 A Correct. And the same applies as before, 09:37:47 AM
11 there's no need for me to renew it. I was already 09:37:49 AM
12 in the industry. 09:37:52 AM
13 Q MCP 2000, this certification relates to 09:37:54 AM
14 Microsoft 2000 products; correct? 09:38:03 AM
15 A Yes. 09:38:05 AM
16 Q And that is a retired certification to use 09:38:06 AM
17 Microsoft language; correct? Or a Legacy 09:38:10 AM
18 certification? 09:38:13 AM
19 A Yes. 09:38:15 AM
20 Q Microsoft no longer supports Microsoft 2000 09:38:16 AM
21 products; correct? 09:38:19 AM
22 A In general, no. 09:38:23 AM
23 Q There is no way to renew this certification 09:38:30 AM
24 because it's been retired by Microsoft; correct? 09:38:31 AM
25 A Microsoft still offers MCP certifications. 09:38:36 AM

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1	Q	Are you retracting your testimony about you	09:44:20 AM
2		have seen it?	09:44:23 AM
3	A	I have seen Microsoft being used, 2003	09:44:24 AM
4		Server.	09:44:28 AM
5	Q	So that's the it?	09:44:29 AM
6	A	Yes.	09:44:30 AM
7	Q	Nothing more?	09:44:31 AM
8	A	No.	09:44:32 AM
9	Q	What is MCSE?	09:44:42 AM
10	A	Microsoft Certified Systems Engineer.	09:44:44 AM
11	Q	And Microsoft offers a recertification for	09:44:55 AM
12		that; correct?	09:44:57 AM
13	A	Yes, they do.	09:45:00 AM
14	Q	And to do that you have to pass an exam?	09:45:02 AM
15	A	Yes.	09:45:05 AM
16	Q	And have you done that?	09:45:06 AM
17	A	Actually, that would be, I believe, seven	09:45:07 AM
18		exams.	09:45:10 AM
19	Q	But to recertify, you have to pass an exam;	09:45:12 AM
20		right?	09:45:14 AM
21	A	Yes.	09:45:16 AM
22	Q	Have you done that?	09:45:16 AM
23	A	No.	09:45:17 AM
24	Q	So MCSE you have not recertified; correct?	09:45:18 AM
25	A	Correct. I haven't obtained the more	09:45:23 AM

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Jeffrey A. Hansen - 7/18/2016

1	correct?	09:46:28 AM
2	A Yeah, I believe it was representative of	09:46:28 AM
3	six months of experience.	09:46:31 AM
4	Q And did you -- on the disk did you produce	09:46:33 AM
5	your certification number from that certification?	09:46:37 AM
6	A Yes.	09:46:39 AM
7	Q I-Net+ is also issued by Comp TIA; right?	09:46:44 AM
8	A Yes.	09:46:49 AM
9	Q And requires six months of IT experience?	09:46:54 AM
10	A Yes.	09:46:58 AM
11	Q It's a low level, entry level certificate?	09:47:01 AM
12	A Again, as representative of somebody with	09:47:04 AM
13	about six months of experience.	09:47:06 AM
14	Q And that certification was retired in 2007;	09:47:09 AM
15	correct?	09:47:14 AM
16	A I'm not sure. I didn't follow that.	09:47:14 AM
17	Q So you're not -- are you aware of whether	09:47:18 AM
18	that one is retired?	09:47:20 AM
19	A Again, I am not -- I'm not aware of whether	09:47:23 AM
20	it is or not.	09:47:25 AM
21	Q Security+ is also given by Comp TIA; right?	09:47:30 AM
22	A Yes.	09:47:34 AM
23	Q Are you aware of whether that is supposed	09:47:47 AM
24	to be renewed every three years?	09:47:48 AM
25	A Mine does not have to be. Mine does not	09:47:51 AM

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Jeffrey A. Hansen - 7/18/2016

1	expire.	09:47:53 AM
2	Q Why do you say it does not have to be	09:47:54 AM
3	renewed every three years?	09:47:56 AM
4	A That particular one I followed up and	09:47:57 AM
5	checked on it. And because I took my exam when I	09:47:59 AM
6	did, mine does not retire. I took my exam before	09:48:04 AM
7	Security+ was offered to the public. I was one of	09:48:11 AM
8	the people to give feedback for Comp TIA in	09:48:13 AM
9	developing that exam.	09:48:17 AM
10	Q So that would have been sometime between	09:48:20 AM
11	2000 and 2002?	09:48:22 AM
12	A Yes.	09:48:24 AM
13	Q Okay. At that time when they issued the	09:48:24 AM
14	certifications, it is your understanding that if you	09:48:28 AM
15	got it at that time you didn't ever have to renew	09:48:30 AM
16	it?	09:48:32 AM
17	A In my case I know that to be the case.	09:48:34 AM
18	Q Right.	09:48:37 AM
19	How about now, someone went out -- if some	09:48:38 AM
20	civilian went out there and got the certification,	09:48:41 AM
21	they're subject to the renewal requirement?	09:48:43 AM
22	A Yes.	09:48:45 AM
23	MR. LESTER: Calls for -- go ahead.	09:48:46 AM
24	THE WITNESS: Yeah, that one I happen to	09:48:47 AM
25	know.	09:48:50 AM

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Jeffrey A. Hansen - 7/18/2016

1	///	09:48:50 AM
2	BY MR. GERSHMAN:	09:48:50 AM
3	Q CIW Security Analyst, who issues that?	09:48:50 AM
4	A CIW, I believe that was the name.	09:48:56 AM
5	Q And that was retired in 2011; correct?	09:49:01 AM
6	A I'm not sure.	09:49:05 AM
7	Q Do you know sitting here whether that is	09:49:06 AM
8	current or retired?	09:49:09 AM
9	A No, I don't know. And that one I don't	09:49:10 AM
10	have produced because I wasn't -- I went to their	09:49:14 AM
11	website, I wasn't able to obtain a copy of it. It	09:49:17 AM
12	seems like their site had to be redone or something.	09:49:23 AM
13	Q Was the site active or was it just blank?	09:49:29 AM
14	A No, it was active. They said that they had	09:49:32 AM
15	to -- their site had gone down and people had to	09:49:34 AM
16	reestablish their accounts or something to that	09:49:40 AM
17	effect. Either way I wasn't able to log in.	09:49:42 AM
18	Q When was that?	09:49:45 AM
19	A A few weeks ago.	09:49:47 AM
20	Q How many times did you check?	09:49:50 AM
21	A How many times did I check when?	09:50:00 AM
22	Q You mentioned a few weeks ago you went to	09:50:02 AM
23	the website.	09:50:05 AM
24	A Yes.	09:50:05 AM
25	Q Is it just the one time? That's what I'm	09:50:06 AM

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Jeffrey A. Hansen - 7/18/2016

1	asking.	09:50:08 AM
2	A In recent history, yes.	09:50:09 AM
3	Q Okay. As far as you can remember?	09:50:11 AM
4	A Yes, as far as I can remember. Naturally I	09:50:14 AM
5	went there long ago.	09:50:17 AM
6	Q You're a certified teacher?	09:50:40 AM
7	A I was.	09:50:42 AM
8	Q When did you get that certification?	09:50:44 AM
9	A I believe that was around the year 2000.	09:50:49 AM
10	Q What was the certification for?	09:50:53 AM
11	A I think I have it spelled out here. For	09:50:56 AM
12	instructor both for the state of California and the	09:50:59 AM
13	state of Oregon there's two separate ones, that was	09:51:01 AM
14	through the Bureau for Private Postsecondary and	09:51:04 AM
15	Oregon's equivalent of that and that was for being	09:51:08 AM
16	an instructor for a computer installation repair	09:51:11 AM
17	technology computer systems networking and	09:51:15 AM
18	telecommunication microcomputer applications,	09:51:18 AM
19	Microsoft and Windows Excel.	09:51:20 AM
20	Q So how many -- according to you, how many	09:51:22 AM
21	agencies certified you as a teacher?	09:51:24 AM
22	A That was actually two, two agencies.	09:51:26 AM
23	Q Are they both called Bureau for Private	09:51:29 AM
24	Postsecondary and Vocational Education?	09:51:31 AM
25	A I don't know if Oregon went by that name	09:51:33 AM

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Jeffrey A. Hansen - 7/18/2016

1 specifically, but California did. 09:51:36 AM

2 Q Okay. So when your CV says certified by 09:51:37 AM

3 Bureau for Private Postsecondary and Vocational 09:51:40 AM

4 Education, that refers to California; is that right? 09:51:44 AM

5 A Yeah, that refers to California 09:51:54 AM

6 specifically. 09:51:55 AM

7 Q Okay. And the certification that you have 09:51:58 AM

8 for Oregon, you don't know who gave that to you; is 09:52:02 AM

9 that right? 09:52:08 AM

10 A It was through their state department as 09:52:08 AM

11 well -- their Consumer Affairs Department as well. 09:52:11 AM

12 Q Is that the name of it or you're just 09:52:15 AM

13 describing it? 09:52:17 AM

14 A I'm describing it. 09:52:17 AM

15 Q Okay. Did you produce those certifications 09:52:19 AM

16 on the disk? 09:52:23 AM

17 A No, not that one. 09:52:24 AM

18 Q Why not? 09:52:25 AM

19 A Because after 16 years I can't locate it. 09:52:26 AM

20 Q Did you -- 09:52:29 AM

21 MR. LESTER: I'm sorry, when you say that 09:52:30 AM

22 one -- 09:52:31 AM

23 THE WITNESS: The certification from the 09:52:32 AM

24 Department of Consumer Affairs for the Bureau of 09:52:35 AM

25 Private Postsecondary. I don't have that 09:52:39 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
Jeffrey A. Hansen - 7/18/2016

1 certification. I don't know where I -- I don't know 09:52:42 AM
2 where it is after 16 years. I can't find it. 09:52:45 AM
3 BY MR. GERSHMAN: 09:52:49 AM
4 Q So on the disk do you have either 09:52:49 AM
5 California or Oregon? 09:52:52 AM
6 A No. 09:52:54 AM
7 Q Did you call the Oregon agency? 09:52:56 AM
8 A No. 09:53:00 AM
9 Q Did you go onto the website to see if you 09:53:03 AM
10 could order another copy? 09:53:05 AM
11 A No. I wouldn't know what website to go to. 09:53:06 AM
12 Q Did you call the Bureau for Private 09:53:10 AM
13 Postsecondary and Vocational Education in 09:53:12 AM
14 California? 09:53:15 AM
15 A I don't know if they came -- if they came 09:53:15 AM
16 back. That department was done away with for a 09:53:17 AM
17 period of time. 09:53:24 AM
18 Q In fact, it is permanently defunct; right? 09:53:25 AM
19 A I don't know. I know at one time it was no 09:53:28 AM
20 more. 09:53:31 AM
21 Q I have asked that the next document be 09:53:54 AM
22 marked as Exhibit 31. 09:53:56 AM
23 (Exhibit 31 was marked for identification 09:53:59 AM
24 by the court reporter and is attached hereto.) 09:53:59 AM
25 BY MR. GERSHMAN: 09:53:59 AM

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Jeffrey A. Hansen - 7/18/2016

[illegible]

15 A I started at Amsec and these are -- 11:04:29 AM

16	Q	How many jobs are these?	11:04:34 AM
----	---	--------------------------	-------------

17	A	That's what I was going to try to clarify	11:04:35 AM
----	---	---	-------------

18 there.

11:04:38 AM

19	Q	Thank you.	11:04:38 AM
----	---	------------	-------------

20	A	This is a defense contracting position.	11:04:39 AM
----	---	---	-------------

21 I'm still there now. The way that it works is when 11:04:42 AM

22 a new company wins the bid, basically the new 11:04:48 AM

23 company rolls me over. So I have been working in 11:04:51 AM

24 that same position from 2004 to the present. But 11:04:53 AM

25 during that time Amsec had the contract, then 11:04:57 AM

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Jeffrey A. Hansen - 7/18/2016

1	Lateott, then HP.	11:05:02 AM
2	Q So then are you employed by those companies	11:05:05 AM
3	or are you an independent contractor for them?	11:05:07 AM
4	A So I'm employed by these companies.	11:05:10 AM
5	Q So no longer employed by Amsec or Lateott,	11:05:12 AM
6	but currently HP? Is that the order of it?	11:05:15 AM
7	A That's correct. And technically it's	11:05:19 AM
8	HP Enterprise Services. It is now a separate	11:05:20 AM
9	company from HP.	11:05:23 AM
10	Q And this job involves connecting machines	11:05:25 AM
11	to the Internet using fiber?	11:05:30 AM
12	A When the ships come in and out of the port,	11:05:34 AM
13	I provide them with fiber optic connectivity.	11:05:36 AM
14	Q How time consuming is that? Is it a	11:05:53 AM
15	full-time job?	11:05:58 AM
16	A It's a full-time job, but there's a lot of	11:06:00 AM
17	wait time. Naturally I have got to wait for the	11:06:02 AM
18	ship to pull in and more so.	11:06:05 AM
19	Q Do you clock in and out or do you just keep	11:06:08 AM
20	a time sheet?	11:06:11 AM
21	A We have just a time sheet that we keep.	11:06:12 AM
22	Q So how many hours a week on average?	11:06:15 AM
23	A Well, it's a 40-hour job.	11:06:16 AM
24	Q So what percentage of the 40 hours could	11:06:19 AM
25	you estimate is spent actually doing the work as	11:06:23 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	opposed to waiting for a ship?	11:06:27 AM
2	A About 50 percent.	11:06:37 AM
3	Q Half and half?	11:06:39 AM
4	A Yes.	11:06:40 AM
5	Q So where do you wait?	11:06:40 AM
6	A Well, we wait in a van on the pier.	11:06:43 AM
7	Q What do you do to pass the time?	11:06:49 AM
8	A The deposition transcript I'll be reading	11:06:53 AM
9	while I'm sitting in the van on the pier waiting for	11:06:56 AM
10	the ship to moor.	11:06:59 AM
11	Q Your expert job, that's what -- you do that	11:07:01 AM
12	in the van or --	11:07:04 AM
13	A Well, yeah, because we're sitting there on	11:07:05 AM
14	the pier waiting for the ship to moor, because we	11:07:08 AM
15	can't go on board until it is actually moored, so	11:07:11 AM
16	I'll get some reading done in the meantime.	11:07:15 AM
17	Q How many hours a week -- let me back up.	11:07:27 AM
18	You have a separate TCPA witness business?	11:07:32 AM
19	A Yes.	11:07:36 AM
20	Q And your e-mail address has a domain of	11:07:37 AM
21	TCPAwitness.com?	11:07:40 AM
22	A Yes.	11:07:42 AM
23	Q How long have you had that?	11:07:42 AM
24	A That domain name?	11:07:44 AM
25	Q Yes.	11:07:45 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	Roughly about a year. I'm kind of guessing	11:07:50 AM
2		on that.	11:07:53 AM
3	Q	How long have you been doing your TCPA	11:07:53 AM
4		witness work?	11:07:56 AM
5	A	Ultimately since -- let me look on my --	11:07:58 AM
6		ultimately since 2007, October of 2007.	11:08:05 AM
7	Q	So how many hours a week do you devote to	11:08:10 AM
8		the TCPA witness work?	11:08:14 AM
9	A	Currently in the area of 60 or 70, roughly.	11:08:19 AM
10	Q	And does that overlap with the 40 hours	11:08:26 AM
11		with the ship work?	11:08:28 AM
12	A	Some of the stuff that while I'm at the	11:08:31 AM
13		base that I can do, for example, reading a	11:08:32 AM
14		transcript, that kind of stuff, I can do while I'm	11:08:36 AM
15		waiting on a ship. So that helps offset some of	11:08:40 AM
16		that a little bit.	11:08:45 AM
17	Q	Why do you have to wait on the dock? Why	11:08:46 AM
18		can't you just show up when the ship comes?	11:08:48 AM
19	A	Because they would be calling and	11:08:51 AM
20		complaining that nobody is there. They want	11:08:52 AM
21		Internet.	11:08:55 AM
22	Q	So do you basically just man the dock and	11:09:04 AM
23		then connect the ships that come in or do people	11:09:07 AM
24		tell you come and connect the ship because it is	11:09:10 AM
25		coming?	11:09:12 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	No, I know when the ships are coming in.	11:09:13 AM
2		We have a schedule.	11:09:15 AM
3	Q	So when you add it all up, how many hours a	11:09:20 AM
4		week are you working?	11:09:24 AM
5	A	Lately for the past -- this past month has	11:09:28 AM
6		been crazy. I have been working 18- to 20-hour	11:09:40 AM
7		days.	11:09:44 AM
8	Q	So 18 to 20 hours?	11:09:46 AM
9	A	Yes. So I'm actually hoping that it slows	11:09:48 AM
10		down.	11:09:50 AM
11	Q	How long have you been doing 18- to 20-hour	11:09:55 AM
12		days?	11:09:58 AM
13	A	That's been going about three months now,	11:09:59 AM
14		two to three months.	11:10:01 AM
15	Q	Do you have any issues with your systems	11:10:07 AM
16		analyst job like being tired?	11:10:09 AM
17	A	No.	11:10:12 AM
18	Q	No issues?	11:10:13 AM
19	A	No.	11:10:14 AM
20	Q	The next entry on the CV is 2006 San Diego	11:10:17 AM
21		Regional Computer Forensics Lab. What do you mean	11:10:22 AM
22		when you say FBI sponsored?	11:10:27 AM
23	A	That is the FBI computer forensics computer	11:10:30 AM
24		lab.	11:10:35 AM
25	Q	Did you work there?	11:10:35 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	I was a volunteer for almost a year.	11:10:36 AM
2	Q	Were you employed there?	11:10:41 AM
3	A	No.	11:10:42 AM
4	Q	Okay. So through what program did you	11:10:43 AM
5		volunteer? Did you just know someone and they said	11:10:46 AM
6		come on by?	11:10:49 AM
7	A	No. It was kind of unique. I already have	11:10:53 AM
8		a security clearance and so I went to them, I	11:10:56 AM
9		contacted them, and told them I would like to offer	11:11:03 AM
10		my services and help in any way that I can. And we	11:11:08 AM
11		kind of made an agreement that I'll get to learn	11:11:13 AM
12		their whole process and I'll offer -- in exchange	11:11:17 AM
13		I'll offer my services.	11:11:23 AM
14	Q	Who was that deal with?	11:11:26 AM
15	A	That would be with the director of the RCFL	11:11:28 AM
16		at the time.	11:11:31 AM
17	Q	What was that person's name?	11:11:32 AM
18	A	Randy Bolelli, I think. I am not going to	11:11:36 AM
19		try and spell his last name.	11:11:39 AM
20	Q	Did you already know that person, or did	11:11:49 AM
21		you cold call him?	11:11:50 AM
22	A	I cold called him.	11:11:50 AM
23	Q	And at the time you said you had a security	11:11:50 AM
24		clearance?	11:11:51 AM
25	A	Yes.	11:11:52 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	Q	Do you still have that?	11:11:53 AM
2	A	Yes.	11:11:54 AM
3	Q	Is that by -- how do you get the security	11:11:55 AM
4		clearance if you were discharged? How does that	11:11:58 AM
5		work?	11:11:59 AM
6	A	Because I work for a government contractor.	11:12:00 AM
7	Q	So you maintain it through the contractor	11:12:02 AM
8		position?	11:12:04 AM
9	A	Yes.	11:12:04 AM
10	Q	Did you submit to a background check with	11:12:10 AM
11		the laboratory?	11:12:12 AM
12	A	I believe they did one independently as	11:12:14 AM
13		well.	11:12:17 AM
14	Q	Did they polygraph you?	11:12:17 AM
15	A	No.	11:12:20 AM
16	Q	Drug test?	11:12:21 AM
17	A	I don't think so.	11:12:25 AM
18	Q	Let me ask it this way.	11:12:30 AM
19		Did you provide them with any samples for a	11:12:31 AM
20		drug test?	11:12:33 AM
21	A	I don't think so.	11:12:35 AM
22	Q	And how long were you doing this volunteer	11:12:39 AM
23		job?	11:12:42 AM
24	A	I did it from -- it was either February or	11:12:44 AM
25		March of 2006 all the way through to at least	11:12:52 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	October, maybe later.	11:13:00 AM
2	Q Did you sign any nondisclosures with them?	11:13:03 AM
3	A My nondisclosure would be my security	11:13:10 AM
4	clearance basically.	11:13:13 AM
5	Q Did you fill out any paperwork with them?	11:13:15 AM
6	A I didn't have to fill out paperwork for	11:13:17 AM
7	that.	11:13:18 AM
8	Q How do you show them a security clearance?	11:13:18 AM
9	Is there a badge?	11:13:21 AM
10	A No. The government, the federal	11:13:22 AM
11	government, has -- basically has me -- a file on me.	11:13:27 AM
12	Q Okay. Did you give them like a passport or	11:13:31 AM
13	a Social Security Card?	11:13:36 AM
14	A No. They did -- they do a complete	11:13:37 AM
15	background investigation for a security clearance	11:13:40 AM
16	plus they have to do continuing investigations to	11:13:43 AM
17	maintain it.	11:13:47 AM
18	Q I don't mean for you to -- that was an	11:13:47 AM
19	unclear question. I'm not asking how you got the	11:13:50 AM
20	security clearance, but how you got through the	11:13:54 AM
21	doors to volunteer, did you fill out any paperwork?	11:13:56 AM
22	Did you give them any documentation? Or did you	11:14:00 AM
23	just tell them your name and they just looked you	11:14:02 AM
24	up?	11:14:04 AM
25	A They just looked me up.	11:14:04 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	Q	And it says you built several forensic	11:14:07 AM
2		machines with large fiber channel RAID assemblies	11:14:09 AM
3		for use in the field.	11:14:13 AM
4	A	Yes.	11:14:14 AM
5	Q	For the layperson, that is you installed	11:14:15 AM
6		redundant media storage, hard drives, things of that	11:14:21 AM
7		nature?	11:14:26 AM
8	A	That would be just one small little aspect	11:14:26 AM
9		it.	11:14:28 AM
10	Q	The RAID?	11:14:29 AM
11	A	The RAID, yeah.	11:14:30 AM
12	Q	Let's see, installed and configured systems	11:14:34 AM
13		for mobile laboratory.	11:14:36 AM
14	A	Yes.	11:14:38 AM
15	Q	What's a mobile lab? Do you mean an FBI	11:14:38 AM
16		truck?	11:14:41 AM
17	A	Yes.	11:14:42 AM
18	Q	And you -- from what, from the shell of a	11:14:42 AM
19		truck you installed the whole system?	11:14:45 AM
20	A	No. All of the computer systems that were	11:14:47 AM
21		used for forensic exams.	11:14:50 AM
22	Q	Who do they normally use for this work?	11:14:53 AM
23	A	What's that?	11:14:55 AM
24	Q	Okay. So you were volunteering for less	11:14:56 AM
25		than -- for maybe six months.	11:14:59 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	No, it was more than that. It was more	11:15:02 AM
2		like seven or eight -- seven, eight months, maybe	11:15:04 AM
3		nine months.	11:15:11 AM
4	Q	Seven, eight, nine months you're	11:15:12 AM
5		volunteering at the lab and they have you installing	11:15:14 AM
6		computer systems in their truck?	11:15:16 AM
7	A	Oh, yeah.	11:15:18 AM
8	Q	Who did they normally use when they're not	11:15:19 AM
9		so fortunate to have someone walk off the street and	11:15:21 AM
10		volunteer their time?	11:15:24 AM
11	A	They would have had one of their guys doing	11:15:25 AM
12		it.	11:15:27 AM
13	Q	Why did they agree to let you do it?	11:15:27 AM
14	A	Oh, well, I was offering -- the exchange	11:15:30 AM
15		was mutually beneficial for both of us. I was	11:15:33 AM
16		offering any services that I could offer and in	11:15:36 AM
17		exchange I was being utilized in every part of their	11:15:40 AM
18		process so that I could learn -- you know, because I	11:15:44 AM
19		told them -- I said I wanted to know -- and I think	11:15:48 AM
20		verbatim what I said was -- when he asked, well,	11:15:51 AM
21		what do you want in exchange, I said I want to know	11:15:53 AM
22		your process when the evidence walks in the door	11:15:56 AM
23		from the moment it walks in to the moment it leaves.	11:15:59 AM
24	Q	Did you handle evidence?	11:16:17 AM
25	A	In some aspects, yes.	11:16:21 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	were left?	11:42:14 AM
2	A One of the things that we did is we set it	11:42:15 AM
3	up to where the recipient of a call can press a	11:42:17 AM
4	button to leave a message themselves.	11:42:23 AM
5	Q Are there any other call centers that you	11:42:28 AM
6	have set up besides Homeytel?	11:42:41 AM
7	A Well, Homeytel was pretty well a full-time	11:42:43 AM
8	thing with the changing it out as frequently as we	11:42:47 AM
9	did, because as the demand for more lines grew, the	11:42:50 AM
10	demand for other dialers and other types of phone	11:42:55 AM
11	lines changed.	11:42:57 AM
12	Other than that, I have advised some of his	11:43:02 AM
13	clients who are also -- who had call centers, I	11:43:06 AM
14	would give them advice and help and, you know, help	11:43:09 AM
15	them with little issues of theirs.	11:43:13 AM
16	Q But for which companies did you physically	11:43:17 AM
17	set up the call center?	11:43:19 AM
18	A It would be Homeytel's.	11:43:20 AM
19	Q That's the only one?	11:43:22 AM
20	A Yes.	11:43:23 AM
21	Q What were the other names of the other	11:43:24 AM
22	companies you mentioned?	11:43:27 AM
23	A I don't remember. Those were real quick	11:43:28 AM
24	and short and it was -- I don't remember the names.	11:43:33 AM
25	Q Have you operated any other dialers?	11:43:39 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	Yes.	11:43:44 AM
2	Q	And which ones?	11:43:45 AM
3	A	My own.	11:43:47 AM
4	Q	You have your own?	11:43:48 AM
5	A	Yes.	11:43:49 AM
6	Q	How many?	11:43:50 AM
7	A	One. When I need one, I'll fire it up.	11:43:51 AM
8	Q	Where is it?	11:43:55 AM
9	A	It is at home.	11:43:56 AM
10	Q	That's where you work out of?	11:43:58 AM
11	A	Yes.	11:44:00 AM
12	Q	What do you use that for?	11:44:01 AM
13	A	I made some calls for friends of mine when	11:44:05 AM
14		they're running for political office.	11:44:10 AM
15	Q	Can we call them robocalls then?	11:44:13 AM
16	A	No. I still don't like the term, because	11:44:15 AM
17		it is only one small group of people that uses the	11:44:18 AM
18		term robocalls -- well, no, two.	11:44:20 AM
19	Q	I want to use the terms that you're	11:44:22 AM
20		comfortable with.	11:44:24 AM
21	A	Yeah, I just say prerecorded.	11:44:26 AM
22		So I have done some prerecorded messages	11:44:28 AM
23		with those. I've also done some predictive dial,	11:44:30 AM
24		but I don't like doing predictive dial in some	11:44:33 AM
25		reasons.	11:44:38 AM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	A	Yes.	12:59:14 PM
2	Q	And any other employees?	12:59:15 PM
3	A	No. I have my wife helping with some of	12:59:17 PM
4		the administrative stuff.	12:59:20 PM
5	Q	She's not on the actual corporation	12:59:21 PM
6		payroll?	12:59:24 PM
7	A	No, she is. She's on the payroll.	12:59:26 PM
8	Q	Okay. So how many employees total?	12:59:27 PM
9	A	It would be me and her.	12:59:30 PM
10	Q	And you run that out of your house?	12:59:34 PM
11	A	Yes.	12:59:36 PM
12	Q	In Spring Valley?	12:59:41 PM
13	A	Yes.	12:59:43 PM
14	Q	The phone number you list on your CV, is	12:59:45 PM
15		that a landline or a cell phone? It is on the first	12:59:49 PM
16		page of your CV.	12:59:56 PM
17	A	It's a landline. That's voice over IP.	12:59:58 PM
18		That gets forwarded to my cell.	01:00:02 PM
19	Q	So in this case was Hansen Legal	01:00:07 PM
20		Technologies engaged?	01:00:12 PM
21	A	Yes.	01:00:14 PM
22	Q	And the work that you described in your	01:00:20 PM
23		report that you did on this case, where did you do	01:00:22 PM
24		that work?	01:00:25 PM
25	A	I did that from my house.	01:00:26 PM

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Jeffrey A. Hansen - 7/18/2016

1	Q	The home office?	01:00:28 PM
2	A	Yes.	01:00:29 PM
3	Q	Do you have a separate room in the house	01:00:30 PM
4		just for the home office?	01:00:32 PM
5	A	Yes.	01:00:34 PM
6	Q	Is it single-family?	01:00:36 PM
7	A	Yes.	01:00:38 PM
8	Q	And on what system do you do that? Do you	01:00:39 PM
9		have a desktop computer, a laptop or both?	01:00:45 PM
10	A	I have multiple machines. This particular	01:00:48 PM
11		case was done on a laptop.	01:00:51 PM
12	Q	Do you know what kind?	01:00:54 PM
13	A	It is an Asus.	01:01:01 PM
14	Q	How many other machines at your home office	01:01:04 PM
15		do you use for your TCPA witness job?	01:01:06 PM
16	A	I use a total of five for different things.	01:01:16 PM
17	Q	And on your Asus machine that's used in	01:01:22 PM
18		this case, what's the operating system?	01:01:25 PM
19	A	Linux Mint 17.2.	01:01:30 PM
20	Q	Does it have a built-in hard drive?	01:01:33 PM
21	A	This one it's a removable hard drive.	01:01:39 PM
22	Q	Is that where you --	01:01:42 PM
23	A	Maybe I'm not being clear.	01:01:45 PM
24	Q	Okay.	01:01:46 PM
25	A	As compared to that machine there which has	01:01:47 PM

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Jeffrey A. Hansen - 7/18/2016

1 Q How do you find time to work on all of the 01:36:09 PM
2 different reports? 01:36:11 PM
3 A That's why I work at home. I can work 01:36:12 PM
4 through the night. 01:36:15 PM
5 Q Or in the van? 01:36:16 PM
6 A Yeah. 01:36:17 PM
7 Q You mentioned the Strauss case earlier, 01:36:34 PM
8 were you engaged as an expert in that case? 01:36:38 PM
9 A Yes. 01:36:40 PM
10 Q Did you give a report? 01:36:41 PM
11 A Yes. 01:36:42 PM
12 Q Did you testify? 01:36:44 PM
13 A No. 01:36:46 PM
14 Q You were hired by the plaintiffs' counsel 01:36:50 PM
15 in that case? 01:36:51 PM
16 A Yes. 01:36:52 PM
17 Q Would you say in the last 12 months you 01:37:04 PM
18 have probably done maybe a hundred TCPA punitive 01:37:06 PM
19 class action lawsuits? 01:37:13 PM
20 MR. LESTER: Objection as to form. When 01:37:20 PM
21 you say done class action lawsuits, the term done is 01:37:26 PM
22 vague. 01:37:29 PM
23 MR. GERSHMAN: I'll rephrase. 01:37:31 PM
24 MR. LESTER: Okay. 01:37:31 PM
25 BY MR. GERSHMAN: 01:37:32 PM

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EXHIBIT 6

PROPOSED TO BE FILED UNDER SEAL PURSUANT
TO CONFIDENTIALITY PROTECTIVE ORDER (DKT. 31)
AND SUPPLEMENTAL PROTECTIVE ORDER TO GOVERN
THE PRODUCTION/INSPECTION OF SOURCE CODE (DKT. 75)

EXHIBIT 7

PROPOSED TO BE FILED UNDER SEAL PURSUANT
TO CONFIDENTIALITY PROTECTIVE ORDER (DKT. 31)
AND SUPPLEMENTAL PROTECTIVE ORDER TO GOVERN
THE PRODUCTION/INSPECTION OF SOURCE CODE (DKT. 75)

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October, 2016, I caused to be served copies of the foregoing documents, via ECF on the following:

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